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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 15-CR-167 CRB
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	CHANGING DATE FOR STATUS HEARING AND
v.)	EXCLUDING TIME FROM APRIL 6, 2016 TO
)	JUNE 15, 2016
CLAUDIO RENEE SUNUX, et al.,)	
)	
Defendants.)	

This matter is currently set for a status hearing on April 6, 2016. The defendants and the government have appeared before the Court on January 20, 2016, in order to update the Court regarding discovery and the possibility of reaching a pre-trial resolution regarding the matter.

The parties respectfully request that the status hearing be moved to June 15, 2016 at 2:00 p.m. or another time on that day that meets the Court's schedule. As a basis for this request, the parties state that they are approaching a resolution as to the case, and need additional time to determine if a pre-trial resolution is possible. The parties further represent that discovery is ongoing. The parties anticipate that they will be able to advise the Court as to whether to set a trial date at the next appearance. The parties would be available on June 15, 2016.

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~~PROPOSED~~ ORDER CHANGING HEARING DATE AND EXCLUDING TIME
15-CR-167 CRB

1 The parties also request that time be excluded under the Speedy Trial Act between April 6, 2016,
2 the date of the originally scheduled status conference, and June 15, 2016, for the purpose of continuity
3 of counsel as well as effective preparation of counsel, taking into account due diligence. 18 U.S.C. §
4 3161(h)(7)(B)(iv).

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6 SO STIPULATED:

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8 BRIAN J. STRETCH
United States Attorney

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10 DATED: April 4, 2016

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13 /s/
ADAM WRIGHT
Assistant United States Attorney

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15 DATED: April 4, 2016

16 /s/
DOUGLAS HORNGRAD
Attorney for Claudio Rene Sunux

17
18 DATED: April 4, 2016

19 /s/
JESSE GARCIA
Attorney for Amanda Lopez

20
21 DATED: April 4, 2016

22 /s/
MARK GOLDROSEN
Attorney for Anibal Giovanni Ramirez

~~PROPOSED~~ ORDER

The Court hereby changes the status hearing scheduled for April 6, 2016 to June 15, 2016. Based upon the representation of counsel and for good cause shown, the Court also finds that failing to exclude the time between April 6, 2016 and June 15, 2016 would unreasonably deprive counsel of the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between April 6, 2016 and June 15, 2016 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time between April 6, 2016 and June 15, 2016 shall be excluded from computation under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

IT IS SO ORDERED.

DATED: April 5, 2016



HON. CHARLES R. BREYER
United States District Court Judge